

STATE OF CALIFORNIA  
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN FRANCISCO BAY REGION

STAFF SUMMARY REPORT (Vincent Christian)  
MEETING DATE: January 23, 2007

ITEM: 10

SUBJECT: **Central Marin Sanitation Agency, Wastewater Treatment Plant and Its Force Main, San Rafael, Marin County - Reissuance of NPDES Permit**

CHRONOLOGY: October 2001 - NPDES Permit Reissued

DISCUSSION: Central Marin Sanitation Agency (CMSA) owns and operates a wastewater treatment plant in San Rafael that services the City of San Rafael and surrounding areas. CMSA discharges about 10 million gallons per day of secondary treated wastewater to Central San Francisco Bay via a deepwater diffuser.

During wet weather, inflow and infiltration into the sanitary sewage collection system cause high flows to the treatment plant which can exceed the treatment capacity. During these conditions, CMSA blends partially treated effluent from the primary clarifier with fully treated effluent from the secondary clarifier prior to discharging to the Bay. CMSA has proposed improvement projects to the treatment plant that should reduce, but not eliminate, blending. The Revised Tentative Order requires CMSA to implement these measures and to develop a strategy to further reduce or eliminate all bypasses in the future.

CMSA, U.S. EPA, and San Francisco Baykeeper commented on Board staff's draft permit. We have responded to all comments (Appendix C), and made appropriate changes to the draft permit, all of which are reflected in the attached Revised Tentative Order. We resolved many issues; however, a few remain. The most significant unresolved comment from CMSA relates to inclusion of final limits for dioxin-TEQ, which it objects to on technical and legal grounds. From Baykeeper the most significant comments relate to the allowance of compliance schedules for mercury and cyanide, and blending during wet weather events.

In our view, final limits for dioxin-TEQ are necessary to comply with existing regulations. Additionally, we believe that compliance schedules are legal, necessary, and technically sound, and that blending is permissible under wet weather conditions since CMSA has

documented that, at this time, there are no feasible alternatives, and the permit requires CMSA to monitor and comply with all limits during blending. We anticipate that some commenters may reiterate their concerns at the Board meeting.

RECOMMEN-  
DATION:

Adoption of the Revised Tentative Order

File Number:

2159.5116 (vc)

Appendices:

- A. Revised Tentative Order
- B. Correspondence
- C. Response to Comments